

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONALD BERDEAUX and CHRISTINE GRABLIS, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

ONECOIN LTD.; RUJA IGNATOVA, KONSTANTIN IGNATOV; SEBASTIAN GREENWOOD; MARK SCOTT; IRINA ANDREEVA DILINSKA; DAVID PIKE; and NICOLE J. HUESMANN,

Defendants.

Case No.: 1:19-cv-04074 (VEC)

**NOTICE OF MOTION  
TO DISMISS THE COMPLAINT  
PURSUANT TO FED. R. CIV. PROC.  
12 (B) (2) and 12(B)(6)**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Motion to Dismiss, the undersigned will move this Court, before the Honorable Valarie Caproni, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square New York, NY 10007, at a date and time to be determined by the Court, for an order dismissing the Plaintiffs' Complaint in this action, pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure and for such further and other relief as the Court may deem just and proper.

Respectfully submitted,

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/s/ Martin R. Raskin  
Martin R. Raskin, Esq.  
Florida Bar No. 305206

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 25th, 2019, I electronically filed the foregoing document with the Clerk of Court using CM/ECF.

/s/ Martin R. Raskin  
MARTIN R. RASKIN